

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Missouri Gas Energy's Tariffs)
Increasing Rates for Gas Service Provided to) Case No. GR-2006-0422
Customers in the Company's Missouri Service)
Area

**MOTION FOR ACCOUNTING AUTHORITY ORDER
CONCERNING THE EMERGENCY COLD WEATHER RULE**

COMES NOW Missouri Gas Energy (MGE), a division of Southern Union Company, pursuant to emergency amendment 4 CSR 240-13.055(14) and Section 393.140 RSMo 2000, and hereby respectfully requests that the Missouri Public Service Commission ("Commission") issue an Accounting Authority Order ("AAO") concerning compliance costs associated with its emergency cold weather rule. In support of this Motion, MGE states as follows to the Commission:

BACKGROUND

1. The Commission's existing rule 4 CSR 240-13.055, the "Cold Weather Rule," sets the conditions for the disconnection and re-connection of heat-related utility services during cold weather by regulated utilities.

2. On December 13, 2005, in Case No. GX-2006-0181, the Commission issued an Order Approving Emergency Amendment in which it adopted an amendment to the Cold Weather Rule (the "Emergency Rule"). The Emergency Rule was identified as Emergency Amendment 4 CSR 24013.055(14). The Emergency Rule became effective on December 26, 2005, and required, in part, that revised collection practices be implemented from January 1, 2006, through March 31, 2006.

3. Moreover, the Emergency Rule provided that a "gas utility shall be

permitted to recover the costs of complying with this rule through an Accounting Authority Order.” 4 CSR 24013.055(14)(G). The Emergency Rule further stated that the “Commission shall grant an Accounting Authority Order, as defined below, upon application of a gas utility, and the gas utility may book to Account 186 for review, audit and recovery all incremental expenses incurred and incremental revenues that are caused by this emergency amendment. Any such Accounting Authority Order shall be effective until September 30, 2007.”

ACCOUNTING AUTHORITY ORDER

4. The Emergency Rule has been applicable to MGE since its effective date and MGE has complied with the Emergency Rule since it became effective.

5. MGE has incurred costs in order to comply with the Emergency Rule and will continue to incur costs as a result of compliance with the Emergency Rule in the future.

6. Therefore, MGE hereby requests the Commission issue its AAO, which includes the following language:

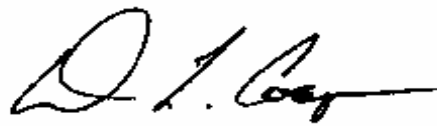
a) That MGE is authorized to maintain on its books a regulatory asset representing all costs of complying with the Emergency Rule (4 CSR 240-13.055(14)); and,

b) That the rates established in this case include, among other things, treatment of amounts deferred by MGE in accordance with 4 CSR 240-13.055(14) and this AAO, and an amortization of such amounts deferred pursuant to this AAO, over a period of time ending no later than three years after rates become effective in this case; and,

c) That any costs of complying with the Emergency Rule that are not addressed by the Commission's Report and Order in this case may remain on MGE's books until the effective date of a Report and Order in MGE's next general rate proceeding.

WHEREFORE, MGE respectfully requests the Commission, issue its Accounting Authority Order, consistent with the request made herein, and for such further orders as the Commission should find reasonable and just.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. L. Cooper", written over a horizontal line.

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ATTORNEYS FOR MISSOURI GAS ENERGY,
A DIVISION OF SOUTHERN UNION
COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 7th day of August, 2006, to:

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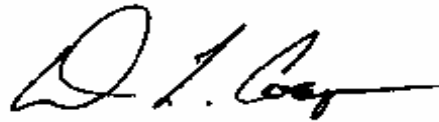
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